

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

Civil Action No. 4:22-cv-00249-ALM

DIVYA GADASALLI, an individual,
Plaintiff,

v.

JERRY BULASA, an individual;
DONG LIAN, an individual; DANYUN LIN, an individual;
TD BANK, N.A., a national banking association;
ABACUS FEDERAL SAVINGS BANK, a federal savings bank;
BINANCE HOLDINGS, LTD. d/b/a Binance, a foreign company; and
POLONIEX, LLC, a Delaware limited liability company;
Defendants.

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JOINT STIPULATION

Plaintiff DIVYA GADASALLI, an individual (“Plaintiff”), and Defendant BINANCE HOLDINGS, LTD. d/b/a Binance, a foreign company (“Defendant BINANCE”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on March 28, 2022, Plaintiff filed her Complaint in this action. [Docket Entry No. (“DE”) 1].

WHEREAS, on April 20, 2022, Defendant BINANCE filed a Motion to Dismiss the Complaint. [DE 17].

WHEREAS, no defendant has yet filed a pleading responsive to the Complaint.

WHEREAS, Plaintiff has advised Defendant BINANCE that Plaintiff intends to amend her Complaint at this stage of the proceedings.

IT IS ACCORDINGLY HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiff and Defendant BINANCE, subject to the Court's approval, that **Plaintiff shall file her Amended Complaint on or before May 20, 2022.**

Respectfully submitted,

SILVER MILLER

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- and -

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was electronically filed with the Clerk of Court on this 3rd day of May 2022 by using the CM/ECF system and that a true and correct copy will be served via electronic mail to: **ALLISON CARROLL, ESQ.**, DUANE MORRIS, LLP, *Counsel for Defendant TD Bank, N.A.*, 100 Crescent Ct. - Suite 200, Dallas, TX 75201, E-mail: ACarroll@DuaneMorris.com; **AMANDA L. COTTRELL, ESQ.**, SHEPPARD MULLIN, *Counsel for Defendant Abacus Federal Savings Bank*, 2200 Ross Avenue - 20th Floor, Dallas, TX 75201, E-mail: ACottrell@SheppardMullin.com; **RYAN SQUIRES, ESQ.**, SCOTT DOUGLASS MCCONNICO LLP, *Counsel for Binance Holdings, Ltd.*, 303 Colorado Street - Suite 2400, Austin, TX 78701, E-mail: rsquires@scottdoug.com; and **KAREN R. KING, ESQ.**, MORVILLO ABRAMOWITZ GRAND IASON & ANELLO, P.C., *Counsel for Binance Holdings, Ltd.*, 565 Fifth Avenue, New York, NY 10017, E-mail: kking@maglaw.com.

/s/ David C. Silver
DAVID C. SILVER